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August 30, 2001

By Hand

Paula Foley, Hearing Officer
Department of Telecommunications and Energy
Commonwealth of Massachusetts
One South Station
Boston, MA 02110

Re: D.T.E. 01-31 – Price Cap Regulation

Dear Ms. Foley:

This letter supplements the Motion of AT&T Communications of New England, Inc. to Compel Discovery Requests by Verizon Massachusetts, or, in the Alternative, to Strike Testimony of Robert Mudge and William E. Taylor. AT&T certifies that it has conferred with counsel for Verizon regarding the information requests discussed in the motion, namely, ATT-VZ 1-1, 1-2(a), and 1-3.

The parties tentatively have reached agreement on ATT-VZ 1-3. Upon receipt of an appropriate supplemental response to ATT-VZ 1-3, AT&T will not seek to compel a response to this information request. The parties have not resolved the dispute regarding ATT-VZ 1-1 and 1-2(a). AT&T seeks to compel Verizon to respond to ATT-VZ 1-1 and 1-2(a) or, in the alternative, to strike the testimony of Robert Mudge and William E. Taylor.

Thank you for your assistance in this matter.

Very truly yours,

Katherine A. Davenport

cc: Service List (by electronic mail only)
Jay E. Gruber, Esq.